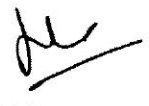


City of Alexandria, Virginia

MEMORANDUM

DATE: APRIL 14, 2010

TO: VIRGINIA PAVING COMMUNITY LIAISON COMMITTEE

THROUGH: LALIT SHARMA, P.E., DIVISION CHIEF, T&ES, OEQ 

FROM: JULIUS HOLMES, AIR COMPLIANCE SPECIALIST, T&ES, OEQ 

SUBJECT: VIRGINIA PAVING ASHALT PLANT UPDATE

The purpose of this memorandum is to provide the committee with an update regarding the operations at the Virginia Paving Asphalt Plant (VA Paving) located at 5601 Courtney Avenue in Alexandria. VA Paving, which operates a hot-mix asphalt facility consists of two production units. In addition to VA Paving, FCC Environmental operates a recycled oil facility within the same property. The Special Use Permit (SUP), issued in November 2006, delineated 78 conditions to protect the health and well being of the community and environment.

The City requests that all complaints suspected to be related to VA Paving be called in immediately to the VA Paving 24-hour Hotline at (703) 906-9918, which can then be followed with calls to Julius Holmes (City staff assigned to VA Paving) or the City Nuisance Abatement hotline. It is extremely difficult to investigate and validate complaints too long after the fact. Please share this with members of the community so that complaints and concerns can be better investigated and resolved. Mr. Holmes' contact information is: (703) 746-4069 office and email address: Julius.holmes@alexandriava.gov

The following are the major benchmarks/milestones since the last Committee meeting on November 19, 2009:

- The Virginia Department of Environmental Quality issued an Operating Permit to VA Paving dated February 17, 2010. With the issuance of the new State Operating Permit (SOP), many of the City's Special Use Permit conditions are incorporated into the SOP and become enforceable by Virginia Department of Environmental Quality. (See Appendix # 1 for a copy of the permit)
- The Virginia Department of Environmental Quality also issued responses to public comments that were made during public process associated with issuance of the permit. As you may recall, the City of Alexandria comments on the draft SOP were submitted on December 10, 2009 at the public hearing hosted by VADEQ. All comments were reviewed and evaluated by VADEQ. Although not all recommendations were adopted many of the current SUP condition were reflected in the new permit. (See Appendix # 2 for copy of VADEQ responses)
- The City of Alexandria's Department of Planning and Zoning has received an application for a minor administrative amendment to its current Special Use Permit # 2005-0042. This minor

administrative amendment application is seeking that the VA Paving plant be allowed the use of natural gas in combination with other fuels already permitted. (See Appendix # 3)

- The City conducted a multi-departmental onsite inspection on March 30, 2010. The inspection of the onsite storm water management system and complete records review were performed March 31, 2010. (See Appendix # 4)
- The City continues to monitor VA Paving's operation and evaluates them against SUP production caps and other limits on a routine basis.
- VA Paving forwarded the City of Alexandria a copy of "Warning Letter" issued by VADEQ to FCC concerning documentation issues. City will be tracking this issue until the time it is resolved by FCC with VADEQ. FCC is working with a consultant to update the documentation for VADEQ review. (See Appendix # 5)
- A biannual report was submitted by VA Paving on January 29, 2010 for the previous six months summarizing their operations.
- The City continues to respond to odor complaints in a timely manner and also monitor community conditions as well as monitor VA Paving' operations on a routine basis.
- The City continues to operate an ambient air monitoring station for particulate matter at the Armistead Boothe Park in Cameron Station. (See Appendix # 6 for the updated data)

Summary of the Virginia Paving Stationary Source Permit #NRO-046-10

The Commonwealth of Virginia, Department of Environmental Quality on February 17, 2010 issued a stationary source permit to modify and operate an asphalt concrete plant located at 5601 Courtney Avenue, Alexandria, Virginia 22304. This amended permit supersedes all other previous permits issued by VADEQ. This new permit resolves the Notice of Violation that was issued to VA Paving by VADEQ. Following lists the major highlights and changes in this newly issued permit:

- The low NOx burner installed on plant # 1 March 14, 2007 has been added to the permit as approved equipment for plant #1.
- The low NOx burner installed on plant # 2 March 14, 2005 is not identified as a low NOx burner in the equipment list in Condition # 1 on page 3 of the permit. It is however referred to as an emission control device for nitrogen oxides for plant # 2 on page 4 Condition 2 and classified as a low NOx burner in this section. The City contacted the manufacturer (Hauck Manufacturing) for conformation; the manufacturer confirmed that this burner indeed was a first generation low NOx burner.
- Hot oil heater (HOH) systems that have been upgraded and reflected in the state operating permit. The primary unit (H: 1) has been replaced by a new unit (Gencor-Hy Way model HYTGO-340). The secondary unit (H: 2) was also replaced with a smaller unit (Heatec HC-120) as a backup only for the primary unit.

- Operating limits for asphalt production have been further reduced. These production caps now align with the City of Alexandria's SUP production limits. Previous production limits of 1,150,000 t/y and 350,000 t/y have been reduced to 810,000 t/y and 170,000 t/y for Plant #1 and Plant #2 respectively.
- Natural gas has been permitted as an approved fuel source in all equipment that is appropriately designed to accommodate this fuel. Upon completion of the natural gas installation plant # 1, Plant # 2, and the primary HOH will have the capacity to operate utilizing natural gas as a combined fuel source.
- Virginia Paving is also required to conduct emissions testing for nitrogen oxides when natural gas becomes available as an alternative fuel for the facility.
- The City of Alexandria recognized and supported the inclusion of PM-2.5 emission limits in the permit for the facility. As a result of this request and supporting evidence the new permit includes revised PM-10 and PM-2.5 emissions limits in the permit.
- This new permit includes new emissions limits based on the most recent stack test report dated April 30, 2009.

VA Paving Complaints and City Response Summary

A 24-hour VA Paving Complaint Hotline was established by VA Paving for all complaints related to VA Paving and FCC Environmental. In addition, the City's 24 hour nuisance abatement hotline takes VA Paving complaints and routes them to the appropriate staff for follow-up. This hotline as well as additional contacts and information resources were disseminated to the community at the Community Liaison Committee meeting held on November 19, 2009. In addition, that information is posted on the City's Planning and Zoning webpage dedicated to VA Paving and it is included in the procedures for the City Nuisance Hotline. The 24-hour VA Paving Complaint Hotline received three complaints dealing with two separate episodes during this time period.

Episode # 1: Odor complaint: A complaint was received via email to Virginia Paving concerning asphalt odors in the Cameron Station area on the morning of December 8, 2009. This complainant references the smell of asphalt in the area at 7:53 AM. This complaint was also received and was investigated by city staff. Virginia Paving was in production during this time. This complaint could not be verified by city staff. In the complaint response the complainant was urged to call the Va Paving hotline for a prompt response, follow-up and verification.

Episode # 2: Odor complaint: A complaint was received via email to the Office of Environmental Quality concerning odors in the Cameron Station area on the morning of February 20, 2010. This complaint was received and was investigated by city staff. Virginia Paving was forwarded a copy of the email. City staff contacted Virginia Paving and confirmed that the plant was not operating. The odor was described as burnt toast. City staff performed a follow up inspection late that morning and no odors were detected at that time.

Episode # 3: Odor complaint: A complaint was received via email to the Office of Environmental Quality concerning asphalt odors in the Cameron Station area on the morning of March 20, 2010. The hotline was not used to log this issue. A follow up inspection was preformed and the complainant was interviewed. Complainant was given the VAP hotline number to generate a quicker response. This complaint could not be verified due to the lag that occurred between the alleged episode and the time the complaint was received.

The City requests that all complaints be called in immediately to the VA Paving 24-hour Hotline at (703) 906-9918, which can then be followed with calls to Julius Holmes (City staff assigned to VA Paving) or the City Nuisance Abatement hotline. It is extremely difficult to investigate and validate complaints too long after the fact. Please share this with members of the community so that complaints and concerns can be better investigated and resolved. Mr. Holmes' contact information is: (703) 746-4069 office and email address: Julius.holmes@alexandriava.gov

Asphalt Production Data

VA Paving submits weekly reports to the City on hourly and daily production data, including the type and quantity of fuels used. This enables the City to monitor operations for limits set in the SUP. On both sets of limitations there have been no violations to date.

Total Annual Production Limit = 980,000 tons	2010 Total Production =4,732 tons *as of March 23, 2010
Night Annual Production Limit = 275,000 tons	2010 Night Production =0 tons *as of March 23, 2010
Permitted Number of Nights = 110	2010 Number of Night Shifts = 0 *as of March 23, 2010

Totals as of (March 23, 2010)

Capital Improvement Projects

Virginia Paving has completed all of the required capital improvement projects. The final phase of the landscape plan and the final one-third of diesel trucks were replaced in 2009. Virginia Paving has continued its environmental training of their staff and optimizing the operation of their Blue Smoke Controls.

Ambient Air Quality Monitoring

The City continues to monitor ambient air for particulate matter at the monitoring station located at Armistead Boothe Park, near the Samuel Tucker Elementary School in Cameron Station. The monitoring is being conducted to measure the ambient air concentration of particulate matter equal to or less than 10 microns in diameter (i.e., PM-10) in the air surrounding Cameron Station. The

report published in November 19, 2009, for the period June 2006 to August 2009, concluded that PM-10 concentrations at Cameron Station remain well below the National Ambient Air Quality Standards.

Appendix:

1. Copy of new state operating permit
2. VADEQ response to public comments
3. Copy administrative SUP change application
4. Multi- departmental inspection report
5. Recently received letters for VADEQ
6. Cameron Station PM10 Air Monitoring Data

